



November 3, 2009

Chair Cathy Reheis-Boyd and Members of the MLPA Blue Ribbon Task Force  
c/o California Natural Resources Agency  
1416 Ninth Street, Suite 1311  
Sacramento, CA 95814  
Via Email: [MLPAComments@resources.ca.gov](mailto:MLPAComments@resources.ca.gov)

**Re: High Level of Protection at Naples Reef and Along the South Coast**

Dear Chair Reheis-Boyd and Members of the Blue Ribbon Task Force:

On behalf of the Environmental Defense Center (EDC) we urge the Blue Ribbon Task Force (BRTF) to retain and strengthen the level of protection at Naples Reef with a “No Take” Marine Protected Area (MPA) and ensure that there is a high level of protection all along the Southern California coast as the BRTF determines which types of MPA’s will be included in the Preferred Alternative for the South Coast region of the Marine Life Protection Act (MLPA).

EDC is a non-profit, public interest law firm dedicated to empowering citizens and community groups to defend the natural treasures within and offshore Santa Barbara, Ventura and San Luis Obispo Counties. Our mission is to protect and enhance the local environment through education, advocacy, and legal action. Program areas include protecting coast and ocean resources, open spaces and wildlife, and human and environmental health. EDC worked for a decade as a key stakeholder in establishing the marine reserve network within the Channel Islands National Marine Sanctuary. EDC believes that MPAs, and the ecosystem-based management paradigm that they embody, are fundamental components of protecting and restoring our ocean environment.

EDC appreciates the time and dedication the BRTF has devoted to the South Coast region of the MLPA over the last twelve months and for your service to the State of California. We gratefully acknowledge the time and commitments poured into all of the marine protected area proposals before you.

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It has come to EDC's attention that the BRTF has tentatively placed a State Marine Conservation Area (SMCA) at Naples Reef. As a local conservation group working for over 30 years in Santa Barbara County, EDC believes Naples Reef should have a high level of protection for its uniqueness, productivity, land and sea conservation potential, scientific research opportunity, recreational diving and snorkeling, and small size. EDC hopes that the BRTF will retain the MPA at Naples Reef and increase the level of protection to a "No Take" MPA for the following reasons:

- **Protect Unique Geologic Formation, Biodiversity and Marine Life.** Naples Reef and its coastline are one of the most spectacular, dramatically diverse underwater habitats on the Mainland Coast in our region. Naples Reef – directly offshore of the surf break – features submerged pinnacles, ledges, and caves that hold a fantastic diversity fish and sea life. Naples reef is truly unique and represents the sustainable abundance of marine life that was historically widespread.
- **Extend Naples-Gaviota Conservation Effort.** Protection of Naples Reef would extend and advance the entire Naples-Gaviota conservation effort from the land to the sea. A "No Take" MPA at Naples including the reef, intertidal zone, and harbor seal rookery would complement the critical efforts at Gaviota to preserve the spectacular adjacent beach and blufftop open space from development.
- **Enhance Scientific Research Opportunities.** Naples Reef is perhaps the best studied marine area in southern California. If made a "No Take" MPA, it would serve as a great scientific control site for measuring the health of the whole coastline.
- **Improve Recreation Diving and Snorkeling.** Divers and snorkelers have loved and marveled at Naples Reef for decades. Naples represents the chance to bring Channel Islands quality recreational diving to the mainland coast. Water clarity, bottom quality, diversity and wildlife at Naples are unique.
- **Create a High Conservation, Low-Socioeconomic MPA.** Naples Reef is a high-conservation, low-socioeconomic cost MPA option. It is a relatively small area (~2 square miles) and protecting it does not require taking many areas out of production for fisheries.

Retaining and strengthening the level of protection at Naples Reef with a "No Take" MPA and ensuring that there is a high level of protection along the entire Southern California coast will fulfill the essential purpose of the MLPA- which is to conserve marine species and ecosystems. We urge the BRTF to make the most out of this historic opportunity.

Thank you for your consideration of our comments. If you have any questions or wish to discuss any issues in more detail, please contact me at (805) 963-1622.

Sincerely,



Kristi Birney Rieman,  
Marine Conservation Analyst